

IN THE UNITED STATES DISTRICT COURT FOR THE
MIDDLE DISTRICT OF TENNESSEE
COLUMBIA DIVISION

GREGORY D. DOUGLAS,)
Plaintiff,)
v.) NO. 1:18-cv-00015
DAMON HININGER, et al.,) Judge Campbell
Defendants.) Magistrate Judge Frensley

DEFENDANTS' PROPOSED JURY VERDICT FORM

Question 1: Do you find that the Plaintiff has proven by a preponderance of the evidence that either Defendant used excessive force against him which resulted in Plaintiff enduring cruel and unusual punishment?

If you answer “No” to Question 1, you do not need to answer Questions 2 through 7. Please have the foreperson sign the form and return it to the Court.

If you answer “Yes” to Question 1, please proceed to Questions 2 through 5.

Question 2: Do you find that either of the Defendants violated Plaintiff's Constitutional rights by using excessive force against him which resulted in Plaintiff enduring cruel and unusual punishment? *Please indicate next to each of the following individuals' name.*

Brandon Bowers Yes: No:
Doreen Trafton Yes: No:

Question 3: Do you find that Plaintiff is entitled to either nominal or compensatory damages?
Please note: You cannot award both nominal and compensatory damages.

Nominal: _____ Compensatory: _____

Question 4: If so, what amount of damages do you find Plaintiff suffered?

Please Note: You cannot award both nominal and compensatory damages

Nominal: \$ _____

Compensatory: \$ _____

Question 5: How do you apportion any damages amongst the Defendants:

Brandon Bowers \$ _____

Doreen Trafton \$ _____

Sign the form and return it to the Court.

SO SAY WE ALL.

Foreperson

Dated: _____

Respectfully submitted,

PENTECOST, GLENN & MAULDIN, PLLC

By: s/J. Austin Stokes
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CERTIFICATE OF CONSULTATION

To date, the undersigned has not received any communications from Plaintiff concerning the pretrial filings referenced/mandated within this Court's Order. (Document 71). On December 30, 2021, the undersigned attempted to schedule a telephone call with Plaintiff at his current facility, Northeast Correctional Complex ("NECX"), located in Mountain City, Tennessee. Due to Plaintiff's current place of confinement, an in-person meeting between the undersigned and Plaintiff is not practicable. The undersigned has been informed that the individuals that facilitate such communications at said facility are unavailable until Tuesday, January 4, 2022.

By: s/J. Austin Stokes
J. Austin Stokes

CERTIFICATE OF SERVICE

This is to certify that I served a copy of this pleading or papers by U.S. mail, first-class, postage prepaid, upon:

Gregory Douglas, #458144
Northeast Correctional Complex
5249 Hwy. 67 West
Mountain City, TN 37683

This the 3rd day of January, 2022.

By: s/J. Austin Stokes
J. Austin Stokes